

United States Courts Southern  
District of Texas  
FILED

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

*October 19, 2021*

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

v.

RHONDA SKILLERN-JONES,

Defendant.

§  
§  
§  
§  
§  
§  
§

CRIMINAL NO.

**4:21cr508**

(UNDER SEAL)

**INFORMATION**

THE UNITED STATES CHARGES:

**Introduction**

At all times material to this Information:

1. The Houston Independent School District ("HISD") was a public entity providing elementary through high school education for students in Houston, Texas. HISD was governed by a Superintendent and a Board of Education consisting of nine elected Trustees. HISD received directly and indirectly through the Texas Education Agency approximately \$300 million per year in federal program funds and grants from the United States Department of Education and other federal agencies. The administration of HISD included a Chief Operating Officer (COO) who managed various departments within HISD, including Construction Services and Facilities Services.

2. BUSINESSMAN 1, operating as COMPANY 1 and COMPANY 2, obtained contracts and purchase orders from HISD to provide grounds maintenance, landscaping, construction, and repair services to HISD properties.

3. ADMINISTRATOR 1 was the HISD Chief Operating Officer and was formerly the HISD Officer of Facilities Services.

4. RHONDA SKILLERN-JONES ("SKILLERN-JONES") was elected to the HISD Board of Education as a Trustee and served two terms from 2012 to 2019. She was the President of the Board in 2015 and 2018.

**COUNT ONE**

**(18 U.S.C. § 371 – Conspiracy)**

5. Beginning in or around 2011 and continuing through in or around 2020, in the Southern District of Texas and elsewhere, the Defendant,

**RHONDA SKILLERN-JONES,**

did willfully, that is, with the intent to further the objects of the conspiracy, and knowingly conspire, confederate, and agree with others known and unknown to the United States, including BUSINESSMAN 1 and ADMINISTRATOR 1, to commit offenses against the United States, that is:

- a. to corruptly give, offer, and agree to give anything of value to any person, with intent to influence and reward an agent of an organization and local government that receives more than \$10,000 in federal assistance in any one-year period, in connection with any business, transaction, and series of transactions of such organization and local government involving anything of value of \$5,000 or more, in violation of Title 18, United States Code, Section 666(a)(2);
- b. being an agent of an organization and local government that receives, in any one-year period, benefits in excess of \$10,000 under a federal assistance program, did corruptly solicit and demand for the benefit of any person, and accept and agree to accept, anything of value from any person, intending to be influenced and rewarded in connection with any business, transaction, and series of transactions of such

organization and local government involving anything of value of \$5,000 or more, in violation of Title 18, United States Code, Section 666(a)(1)(B).

**Manner and Means of the Conspiracy**

It was part of the conspiracy that:

6. BUSINESSMAN 1, through COMPANY 1 and COMPANY 2, obtained purchase orders for construction, repair, landscaping, and maintenance jobs at HISD schools and other HISD properties. BUSINESSMAN 1 obtained these jobs by paying cash bribes or kickbacks to HISD personnel who assisted him in obtaining or retaining business with HISD, including SKILLERN-JONES.

7. In return for bribe payments from BUSINESSMAN 1, SKILLERN-JONES caused to be placed on a 2017 HISD Board agenda, and voted to approve, an expenditure of funds for school landscaping and construction projects that were awarded to BUSINESSMAN 1.

8. ADMINISTRATOR 1 facilitated the bribery relationship between BUSINESSMAN 1 and SKILLERN-JONES, and ADMINISTRATOR 1 personally delivered BUSINESSMAN 1's bribe payments to SKILLERN-JONES.

9. In 2017, BUSINESSMAN 1 maintained a bribe ledger in which he tracked the bribe payments he made in exchange for assistance with securing particular purchase orders. In the ledger, BUSINESSMAN 1 typically listed the HISD schools where his companies COMPANY 1 and COMPANY 2 did construction, repair, grounds maintenance, or landscaping work; the type of work; the amount of the invoice paid by HISD for the work; the amount of the bribe that he paid; the identity of the bribe recipient (identified by initials or first name); the date the bribe was paid; and, at times, the location at which the bribe was paid, such as at local restaurants or schools or while on trips to Las Vegas with the bribe recipients.

10. In the bribe ledger, BUSINESSMAN 1 tracked his bribe payments to SKILLERN-JONES.

**Overt Acts of the Conspiracy**

In furtherance of the conspiracy and to achieve the objects thereof, at least one of the co-conspirators committed or caused to be committed, in the Southern District of Texas and elsewhere, at least one of the following overt acts, among others:

11. In or about 2017, ADMINISTRATOR 1 made a first delivery of funds from BUSINESSMAN 1 to SKILLERN-JONES, related to projects at Holland Middle School and Pleasantville Elementary School.

12. In or about 2017, ADMINISTRATOR 1 made a second delivery of funds from BUSINESSMAN 1 to SKILLERN-JONES, related to projects at Holland Middle School and Pleasantville Elementary School.

All in violation of Title 18, United States Code, Section 371.

**NOTICE OF FORFEITURE**

**(18 U.S.C. § 981(a)(1)(C); 28 U.S.C. § 2461(c))**

13. Pursuant to Title 18, United States Code, Section 981(a)(1)(C), through application of Title 28, United States Code, Section 2461(c), the United States gives notice to Defendant,

**RHONDA SKILLERN-JONES,**

that upon conviction of Count One, all property, real or personal, which constitutes or is derived from proceeds traceable to such offense, is subject to forfeiture.

**Money Judgment and Substitute Assets**

14. The United States gives notice that it will seek a money judgment against the Defendant. In the event that one or more conditions listed in Title 21, United States Code, Section

853(p) exist, the United States will seek to forfeit any other property of the Defendant in substitution.

JENNIFER B. LOWERY  
ACTING UNITED STATES ATTORNEY

A handwritten signature in dark ink, appearing to read 'Robert S. Johnson', written over a horizontal line.

Robert S. Johnson  
Assistant United States Attorney

UNITED STATES DISTRICT COURT

for the

Southern

DISTRICT OF

Texas

United States of America

v.

RHONDA SKILLERN-JONES

)  
)  
)  
)  
)  
)  
)  
)

Case No:

4:21cr508

WAIVER OF INDICTMENT

I understand that I have been accused of one or more offenses punishable by imprisonment for more than one year. I was advised in open court of my rights and the nature of the proposed charges against me.

After receiving this advice, I waive my right to prosecution by indictment and consent to prosecution by information.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Defendant's signature*

\_\_\_\_\_  
*Signature of defendant's attorney*

\_\_\_\_\_  
*Printed name of defendant's attorney*

\_\_\_\_\_  
*Judge's signature*

\_\_\_\_\_  
*Judge's printed name and title*